

EXHIBIT A

EXHIBIT A

Declaration of Taylor A. Buono

1 Z. Kathryn Branson, Esq.
Nevada Bar No. 11540
2 Taylor A. Buono, Esq.
Nevada Bar. No. 15513
3 LITTLER MENDELSON, P.C.
8474 Rozita Lee Avenue
4 Suite 200
Las Vegas, NV 89113-4770
5 Telephone: 702.862.8800
Fax No.: 702.862.8811
6 kbranson@littler.com
tbuono@littler.com

7
8 Attorneys for Defendant
DELTA AIR LINES, INC.

9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 SUSANA IKA,
12 Plaintiff,
13 v.
14 DELTA AIR LINES, INC.,
15 Defendant.

Case No. 2:24-cv-02395-CDS-DJA

**DECLARATION OF TAYLOR A.
BUONO, ESQ. IN SUPPORT OF
DEFENDANT'S MOTION TO COMPEL
DISCOVERY**

16
17 I, Taylor A. Buono, Esq., declare under penalty of perjury as follows:

18 1. I am over eighteen years of age and have personal knowledge of the matters set forth
19 in this Declaration, except as to the matters stated upon information and belief, and as to those matters,
20 I believe them to be true. I could and would competently testify about the information that this
21 Declaration contains.

22 2. I am an attorney admitted to practice law in the State of Nevada and an Associate at
23 the law firm of Littler Mendelson. This firm represents Defendant Delta Air Lines, Inc. in this action.

24 3. On August 15, 2025, Defendant served responses and objections to Plaintiff's First
25 Requests for Production of Documents, which included 36 separate requests.

26 4. On August 18, 2025, Defendant served responses and objections to Plaintiff's Second
27 Requests for Production of Documents, which included 34 separate requests.

28 5. On around August 15, 2025, Plaintiff requested to meet and confer on Defendant's

1 responses to the First Requests for Production of Documents. Shortly thereafter, she requested to meet
2 and confer on Defendant's responses to Plaintiff's Second Requests for Production of Documents.

3 6. Pursuant to Plaintiff's requests, Defense counsel told Plaintiff they would be available
4 to meet and confer on August 22, 2025 at her convenience. Plaintiff did not contact Defense counsel
5 and did not otherwise follow up until October 21, 2025.

6 7. On October 21, 2025, Plaintiff contacted the undersigned and requested to continue the
7 meet and confer efforts.

8 8. Plaintiff and the undersigned exchanged several emails, and ultimately agreed to meet
9 and confer on October 30, 2025.

10 9. During a call on October 30, 2025 involving the undersigned and Plaintiff, Plaintiff
11 stated that all of the discovery responses were inadequate, though Plaintiff did not identify any specific
12 requests at issue and stated that she believed the objections raised were generally inappropriate,
13 without identifying any specific objections or requests. Plaintiff did not offer any arguments to
14 statements to support that the objections were improper, other than the blanket statement that the
15 objections were "improper."

16 10. Plaintiff demanded that Defendant "overnight" documents to her.

17 11. The undersigned stated that Defendant would not agree to "overnight" documents.

18 12. I informed Plaintiff that, if she could not identify specific issues with the responses,
19 beyond the blanket statement that Defendant's objections to the significantly overbroad requests were
20 improper, that Plaintiff was not satisfying the meet and confer requirement. I attempted to engage in
21 good faith meet and confer efforts with Plaintiff regarding the discovery requests and attempted to
22 explain to Ms. Ika that we needed to discuss each request. However, Plaintiff just stated that we must
23 "overnight" all of the documents she requested. Plaintiff did not provide any argument as to why the
24 documents she requested were either relevant, not overly broad, or not overly burdensome.

25 ///

26 ///

27 ///

28 ///

1 13. Ms. Ika terminated the call with me.

2 I declare under penalty of perjury under the laws of the United States of American and the
3 State of Nevada that the foregoing Declaration is true and correct.

4 Executed this 9th day of December, 2025 in Las Vegas, Nevada.

5

6

/s/ Taylor A. Buono
TAYLOR A. BUONO, ESQ.

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28